
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Patrick Berry, Henrietta Brown, Nadine
Little, Dennis Barrow, Virginia Roy, Joel
Westvig, Emmett Williams, *on behalf of
themselves and a class of similarly-
situated individuals*; and ZACAH,

Ct. No. 20-cv-02189 (WMW/LIB)

**DECLARATION OF GRANT
SNYDER IN OPPOSITION TO
MOTION FOR A TEMPORARY
RESTRAINING ORDER**

Plaintiffs,

v.

Hennepin County; Hennepin County
Sheriff David Hutchinson, *in his individual
and official capacity*; City of Minneapolis;
Minneapolis Mayor Jacob Frey, *in his
individual and official capacity*;
Minneapolis Chief of Police Medaria
Arradondo, *in his individual and official
capacity*; Superintendent of the
Minneapolis Park and Recreation Board Al
Bangoura, *in his individual and official
capacity*; Park Police Chief at the
Minneapolis Park and Recreation Board
Jason Ohotto, *in his individual and official
capacity*; Police Officers John Does; and
Police Officers Jane Does,

Defendants.

Your Declarant, Grant Snyder, states and affirms as follows:

1. I am a Lieutenant with the Minneapolis Police Department. I have
been employed with the Minneapolis Police Department for 24 years.

2. My current position with the Minneapolis Police Department is the Lieutenant in charge of the Procedural Justice Unit. My job duties in this position include leading several units within the Minneapolis Police Department. These units include Community Outreach, Recruiting and Hiring, Community Service Officers and the Homelessness and Vulnerable Populations Initiative (“MPD Homelessness Outreach Unit”).

3. The MPD Homelessness Outreach Unit was created in 2018 to act as a liason between people experiencing homelessness and various governmental and non-governmental partners. These partners include schools, state and local agencies, non-profits and city residents. The MPD Homelessness Outreach Unit also provides resources and referrals to people experiencing homelessness including food, clothing and referrals to housing and medical providers. I have been working with the MPD Homelessness Outreach Unit since its creation in 2018.

4. In my career with Minneapolis Police Department I have liasoned with Minneapolis Park Police on a regular basis. While officers with the Minneapolis Park Police and the Minneapolis Police Department wear identical uniforms, the Minneapolis Park Police and the Minneapolis Police Department are two separate law enforcement agencies. They report through two separate chains of command to two different police chiefs. The Minneapolis Park Police is the primary law enforcement agency for Minneapolis Parks, which are under the jurisdiction of the Minneapolis Park and Recreation Board.

5. In the spring of 2020, I was contacted by the Minneapolis Park Police. The Minneapolis Park Police requested that I consult with them regarding their response to the growing and expanding encampments on park property.

6. I, along David O'Connor, another officer in the MPD Homelessness Outreach Unit, provided consultation to the Minneapolis Park Police on these issues. Using the knowledge and expertise we had developed as members of the MPD Homelessness Outreach Unit, we advised Minneapolis Park Police on strategies and approaches to responding to health and safety issues arising in the encampments while also treating those individuals in the encampments with dignity.

7. While I provided general input to the Park Police regarding their response to encampments, it was not my role to advise the Park Police regarding if or when a camp should be demobilized, or cleared.

8. I have reviewed the Complaint in this matter and I am aware that it describes demobilization efforts at different encampments on four Park Board Properties: Powderhorn Park, Peavey Park, Kenwood Park, and Elliot Park.

9. In my role with the Minneapolis Police Department and as a consultant to the Park Police I was present when Park Police cleared each of these encampments. At each of these demobilizations I was wearing plain clothes and did not direct the actions of Park Police or engage in the removal of any persons or property.

10. I have reviewed the photographs appearing in the Complaint. The officers appearing in these pictures are members of the Minneapolis Park Police. I was in charge of any Minneapolis Police Department response during the demobilization efforts at these encampments. No Minneapolis Police Department Officer directed the actions of Park Police or engaged in the removal of any persons or property from these encampments. No Minneapolis Police Department Officer sprayed chemical irritant or otherwise engaged in use of force when these encampments were being cleared.

11. I have reviewed the Complaint and the allegations that Plaintiff Joel Westvig is currently living in an encampment at B.F. Nelson Park and the allegations that Plaintiff Emmett Williams is currently living in an encampment at MLK Park. Both of these parks are under the jurisdiction of the Minneapolis Park and Recreation Board and Minneapolis Park Police.

12. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today's date October 21, 2020.

s/ Grant Snyder
Grant Snyder